

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

MIGUEL RANDALL WATKINS,

Debtor(s).

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Bk. No. **16-02842-CW3-13**
Chapter 13
Judge Charles M. Walker

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: October 25, 2018 IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: November 5, 2018 at 8:30 a.m. in Courtroom 1, 2 nd Floor Customs House, 701 Broadway, Nashville, Tennessee 37203
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TRUSTEE'S OBJECTION TO DEBTOR'S APPLICATION TO MODIFY
PLAN AND INCUR CREDIT

Henry E. Hildebrand, III, Standing Trustee for Chapter 13 matters in the Middle District of Tennessee, respectfully objects to the application filed by the debtor seeking to modify his plan and incur post-petition debt.

The verified dual-entry budget, when correctly added, demonstrates that the debtor's modified plan is not feasible and the debtor does not have the capacity to repay any post-petition debt.

WHEREFORE, THE PREMISES CONSIDERED, the Trustee objects to the application filed by the debtor seeking to modify the plan and incur post-petition debt.

Respectfully submitted,

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee
P. O. Box 340019
Nashville, TN 37203-0019
615-244-1101; Fax 615-242-3241
www.ch13nsh.com
pleadings@ch13nsh.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certifies that on or before the 22nd day of October, 2018, a true and correct copy of the foregoing has been served in the following manner:

Email by Electronic Case Noticing to:

U. S. Trustee
Rothschild & Ausbrooks, Counsel for Debtor

By U. S. Postal Service, postage prepaid to:

Miguel R. Watkins, 2715 Whites Creek Pike, Unit D-150, Nashville, TN 37207

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee